

COMMENTS ON WHITE RIVER SHALE OIL CORPORATION
RESPONSE TO DIVISION REVIEW LETTER

DRAFT

ACT/047/017, Uintah County, Utah

2. The approximate quantities of the various processing flow rates which will be passed into this evaporating holding pond are not addressed in the response.
7. Panel outlines on the submitted mylar overlay are unclear. They should either be discussed or indicated on the mylar in order to clarify the Division's understanding. Also, no yearly sequential estimates were indicated on the submittal. Estimates such as ". . . and data will be transmitted to UDOGM as soon as they are available." are not satisfactory. If information cannot be submitted prior to approval of the application, a specific date of information completion should be committed to beforehand.
12. Any wildlife mitigation plan prepared should be submitted to DOGM as well as the Oil Shale office. A written commitment to this effect should be made.

In accordance with the quote in question 13 "restore the vegetation . . . which will support fauna of the same kinds and numbers . . ." Any riparian habitats which are disturbed should be reclaimed as riparian habitats due to their importance to wildlife. Obviously, areas inundated by the dam would not apply. However, the company could help speed the emergence of riparian vegetation along the edges of the reservoir through some seeding and/or transplanting efforts. This would be a good mitigation technique.

14. If and when subsidence occurs due to the mining technique, employed data results and mitigation plans (if warranted) should be submitted to the Division for approval.
- ✓ 15. In the response, "prior to construction of the solid waste landfill, trash and refuse material will be transported off the Tracts to a State approved solid waste landfill, probably in Vernal." It should be added that appropriate agreements be made for dumping there. DOGM requests copies.
17. The value for the pillar size is based on "available geotechnical data" which indicates the rock in these pillars is competent. The data are requested as well as the source.
18. It is suggested that ripped road pavement be placed underground or in shafts or inclines prior to final surface regrading. The Division does not concur with the current project plans to dispose of this material "in or adjacent to the roadbed." An alternative commitment to this should be made by the applicant.

19. The question is not addressed, "how deeply" the concrete foundations will be buried.
20. The DOGM requests the grading maps to look at the spent shale disposal areas and cross-sections.
27. DOGM still requires a specific numerical standard for revegetation prior to initiation of mining. Since four habitat types, with varying percentages of natural vegetative cover, will be disturbed, the standard for general disturbed areas may be an average figure.

Specific vegetation techniques and standards for the waste rock pile may be submitted at a later date as indicated in the answer to question 30. DOGM would like to receive any annual reports or publications that are developed from such studies.

28. There is a disagreement here as to when monitoring will be conducted (semi-annually or quarterly). Also the monitoring manual does not seem to discuss revegetation monitoring specifically. Will a separate plan for monitoring revegetated areas need to be developed for the Oil Shale Office? If so, DOGM would like a copy. If not, DOGM needs a specific monitoring plan detailing specific methods that will be used to monitor revegetation, and a specific discussion of statistical comparisons to be made between revegetated areas and natural vegetation communities. This should be submitted prior to final permit approval.
32. Specific plans for use of species in the reclamation species mix (i.e., planting rate, locations, treatments) should be submitted to DOGM prior to final permit approval.
33. Is the seed rate for Pure Live Seed? What is the biological basis for the planting of transplants during the fall as opposed to spring?
34. In the general comments about reclamation activities, sealing of the shafts is not mentioned. This should be included.
35. There is a disagreement here as to when monitoring will be conducted (semi-annually or quarterly). Also the monitoring manual does not seem to discuss revegetation monitoring specifically. Will a separate plan for monitoring revegetated areas need to be developed for the Oil Shale Office? If so, DOGM would like a copy. If not, DOGM needs a specific monitoring plan detailing specific methods that will be used to monitor revegetation, and a specific discussion of statistical comparisons to be made between revegetated areas and natural vegetation communities. This should be submitted prior to final permit approval.
37. No approval can be issued prior to the completion of adequate maps and plans.

38. It is not possible to judge the validity of the applicant's claim that nine inches of soil is available for the entire 100 acre disturbance from the information provided.

The depth of topsoil should be evaluated according to each specific area on the color-coded map E-04-E-1 submitted June 8, 1982. What were the

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